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COSTCO WHOLESALE CORPORATION

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

VICTORIA WASHINGTON, an individual

CASE NO. 2:22-cv-00198-APG-EN

Plaintiffs,

vs.

COSTCO WHOLESALE CORPORATION,
a foreign corporation; DOE EMPLOYEES 1
through 20; ROE CORPORATIONS 1
through 20.

Defendants.

STIPULATION AND ORDER TO DISMISS WITH PREJUDICE

Defendant, COSTCO WHOLESALE CORPORATION (hereinafter referred to as "Costco"),
by and through counsel, Edgar Carranza, Esq. and Megan E. Wessel, Esq. of the law firm of MESSNER
REEVES, LLP and Plaintiff, VICTORIA WASHINGTON, by and through counsel Jack Degree, Esq.
of Burg Simpson Eldredge Hersh & Jardine, hereby stipulate as follows:

- I. Plaintiff filed her Complaint on or about February 15, 2022.
- 2 Defendant, Costco filed its Answer on or about March 14, 2022.

3. This matter was removed to this Court and the parties held their FRCP 26(f) conference on March 8, 2022, after which the parties filed the Joint Case Conference Report and embarked on discovery.

4. The Parties have been able to reach a mutually acceptable resolution to this matter which is memorialized in the Settlement and Release Agreement executed contemporaneous hereto.

5. In reaching the resolution Costco does not admit any liability and continues to deny the allegations in the Complaint. Nonetheless, Plaintiffs hereby stipulates to waive any and all claims against Defendant, Costco and dismiss this action with prejudice in exchange for the agreed to resolution.

6. The parties also hereby stipulate, and this court hereby orders, that this settlement is deemed a good faith settlement. Therefore, any and all claims by any other party against Costco are hereby extinguished.

7. There is no trial date currently set in this matter.

8. For the above-outlined reasons, the parties hereby stipulate to dismiss the present litigation, with prejudice.

9. Plaintiff and Defendant will bear their own attorney's fees and costs related to this litigation.

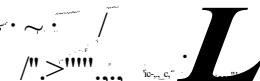
DATED this 3rd day of August, 2023.

DATED this 29th day of August, 2023.


SS E REEVES LP

BURG SIMPSON

By.


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By:


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ORDER

Pursuant to the above Stipulation, THE COURT HEREBY ORDERS, ADJUDGES, AND DECREES that this matter is dismissed, each party to bear their own attorney's fees and costs.

THE COURT FURTHER ORDERS, ADJUDGES AND DECREES that this Stipulation may be executed in one or more counterparts, each of which shall constitute a duplicate original. A facsimile or other non-original signature shall still create a binding and enforceable agreement.

IT IS SO ORDERED.

DATED this 6th day of September 2023.



ANDREW P. GORDON
United States District Judge

Respectfully Submitted,

MESSNER REEVES LLP

By: /s/ Megan Wessel
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